

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<b>IN RE:</b>	§	
	§	
<b>KRISJENN RANCH, LLC</b>	§	<b>CASE No. 20-50805-rbk</b>
	§	
<b>DEBTOR.</b>	§	<b>CHAPTER 11</b>
	§	<b>(Jointly Administered)</b>

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<b>KRISJENN RANCH, LLC, ET AL.</b>	§	
	§	
<b>PLAINTIFFS,</b>	§	
	§	<b>Adversary No. 20-05027-rbk</b>
<b>vs.</b>	§	
	§	
<b>DMA PROPERTIES, INC. ET AL.</b>	§	
	§	
<b>DEFENDANTS.</b>	§	

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**PLAINTIFFS' WITNESS AND EXHIBIT LIST FOR EXPEDITED HEARINGS  
SET FOR WEDNESDAY, JULY 2, 2025 AT 10:00 A.M. (CT)**  
*(Reference Docket Nos. 456 & 457)*

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KrisJenn Ranch, LLC; KrisJenn Ranch, LLC-Series Uvalde Ranch; KrisJenn Ranch, LLC-Series Pipeline ROW (Collectively, “KrisJenn”); and Larry Wright (“Wright”) (together, the “Plaintiffs”) reserves the right to call any or all of the following as witnesses at the above-referenced hearings, including, but not limited to, by affidavit, declaration, or proffer.

1. Any witness called or designated by any other party; and
2. Any rebuttal or impeachment witnesses, as appropriate.

The Debtor reserves all rights to introduce and/or request judicial notice of any or all of the following exhibits as evidence at the hearings, each as may be amended, and expressly including any filed responses thereto, and any exhibits, schedules, addenda, and any and all other attachments or amendments thereto:

<b><i>Motion to Abate (Docket No. 456)</i></b>			
<b>No.</b>	<b>Exhibit</b>	<b>Offered</b>	<b>Admitted</b>
P-1	Motion to Abate (Docket No. 456)		
P-2	Exhibit A to Motion – Declaration of Lourdes Ortiz (Docket No. 456-1)  <i>In re: Express H2O Pipeline and Row, LLC v. Westlake Chemical OPCO, LP</i> ; Cause No. CV-00461-24-08; In the District Court of Angelina County, Texas; 159 <sup>th</sup> Judicial District		
P-3	Exhibit B to Motion – Letter from Andrew Seger with the Office of Key Terrell & Seger LLP to Craig Crockett Dated March 5, 2019 (Docket No. 456-2)  re: The Twenty Percent Net Profits Overriding Royalty of DMA Properties, Inc., In and To the P-21 Express Pipeline Under Agreement Dated February 7, 2018 and Filed as Instrument Number 2018-9233 In the Official Public Records of Rusk County, Texas On or About December 4, 2018		
P-4	Exhibit C to Motion – Email Thread Dated May 21, 2019 (Docket No. 456-3)		
P-5	Plaintiff’s Second Amended Original Petition Filed on April 21, 2025  <i>In re: Express H2O Pipeline and Row, LLC vs. Westlake Chemical OPCO, LP</i> ; Cause No. 00461-24-08; In the District Court of Angelina County; 159 <sup>th</sup> Judicial District		
P-6	Defendant Westlake Chemical OPCO, LP’s Second Amended Original Answer and Petition for Declaratory Judgment Filed on May 5, 2025		

	In re: <i>Express H2O Pipeline and Row, LLC vs. Westlake Chemical OPCO, LP</i> ; Cause No. 00461-24-08; In the District Court of Angelina County; 159 <sup>th</sup> Judicial District		
P-7	Agreed Amended Docket Control Order – Level Three Filed on March 11, 2025		
P-8	Proposed Order Granting Motion to Abate (Docket No. 456-4)		
	Any document entered or filed in the above-styled bankruptcy case, including any exhibits thereto.		
	All exhibits necessary for impeachment and/or rebuttal purposes		
	All exhibits identified by or offered by any other party at the hearing.		

<b><i>Motion for Satisfaction of Attorney's Fees Judgment by Recoupment or Setoff (Docket No. 457)</i></b>			
<b>No.</b>	<b>Exhibit</b>	<b>Offered</b>	<b>Admitted</b>
P-1	Motion for Satisfaction of Attorney's Fees Judgment by Recoupment or Setoff (Docket No. 457)		
P-2	Proposed Order Granting Motion for Satisfaction of Attorney's Fees Judgment by Recoupment or Setoff (Docket No. 457-1)		
	Any document entered or filed in the above-styled bankruptcy case, including any exhibits thereto.		
	All exhibits necessary for impeachment and/or rebuttal purposes		
	All exhibits identified by or offered by any other party at the hearing.		

Dated: July 1, 2025

Respectfully submitted,

**HAYWARD PLLC**

By: /s/Charlie Shelton

Charlie Shelton

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KrisJenn Ranch, LLC-Series Uvalde  
Ranch; KrisJenn Ranch, LLC-Series  
Pipeline ROW; and Larry Wright*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 1, 2025, the foregoing was served via CM/ECF on all parties requesting such service. Additionally, on July 1, 2025, or within one business day thereof, the foregoing was served without exhibits via United States First Class Mail to the parties listed below.

<p>Christopher S. Johns cjohns@cobbjohns.com COBB AND JOHNS 14101 Highway 290 West, Suite 400A Austin, Texas 78737 Telephone: (512) 399-3150 Facsimile: (512) 572-8005</p> <p><b><i>Attorneys for Longbranch Energy DMA Properties, Inc., and Frank Daniel Moore</i></b></p>	<p>Timothy Cleveland tcleveland@clevelandkrist.com Austin Krist akrist@clevelandkrist.com CLEVELAND KRIST PLLC 303 Camp Croft Road, Suite 325 Austin, Texas 78746 Telephone: (512) 689-8698</p> <p><b><i>Attorneys for Longbranch Energy DMA Properties, Inc., and Frank Daniel Moore</i></b></p>
<p>Jeffery Duke jeff@jfduke.com JF DUKE AND ASSOCIATES 11818 Great Oaks Drive College Station, Texas 77494</p> <p><b><i>Attorneys for Longbranch Energy, LP</i></b></p>	<p>Natalie Wilson nwilson@langleybanack.com LANGLEY &amp; BANACK, INC. 745 East Mulberry Avenue, Suite 700 San Antonio, TX 78212 Telephone: 210-736-6600 Facsimile: (210) 735-6889</p> <p><b><i>Attorneys for DMA Properties, Inc. and Frank Daniel Moore</i></b></p>
<p>Michael Black BURNS &amp; BLACK PLLC mblack@burnsandblack.com 750 Rittiman Road San Antonio, Texas 78209 Telephone: 210-829-2022 Facsimile: 210-829-2021 fax</p> <p><b><i>Attorneys for Longbranch Energy, LP</i></b></p>	<p>C. John Muller John.muller@cjma.law CJ MULLER &amp; ASSOCIATES, PLLC 111 W. Sunset Rd. San Antonio, Texas 78209 Telephone: (210) 664-5000</p> <p><b><i>Counsel for KrisJenn Ranch, LLC, Krisjenn Ranch, LLC—Series Uvalde Ranch, KrisJenn Ranch, LLC—Series Pipeline Row</i></b></p>
<p>James Rose OFFICE OF THE U.S. TRUSTEE 903 San Jacinto Blvd, Room 230 Austin, TX 78701 james.rose@usdoj.gov</p>	<p>Ronald J. Smeberg THE SMEBERG LAW FIRM, PLLC 2010 W Kings Hwy San Antonio, TX 78201-4926 ron@smeberg.com</p>

<i>United States Trustee</i>	<i>Counsel for Black Duck Properties, LLC</i>
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/s/ Charlie Shelton  
Charlie Shelton